LCM-16

Dan Tippy, Acting Field Manager
Central Oregon Field Office
3050 NE 3rd Street
Prineville, OR 97754

Dear Mr. Tippy,

Thank you for the opportunity to comment on the Little Canyon Mountain Fuel Reduction Project, EA#OR-054-02-083. Our comments are based on two interests of our Department. First, we are the protection agency for the BLM property on Little Canyon Mountain and the adjacent private lands. We are keenly interested in the fuel conditions and forest health of those lands. Second, a key part of our agency mission is to promote sustainable management of all forestland in the State of Oregon.

We strongly urge an active management approach to dealing with the current conditions on Little Canyon Mountain. This is the approach that we feel will mitigate the fire risk and improve forest health in the most timely manner. We endorse the implementation of either Alternative D or Alternative F as the preferred strategy for managing the vegetation on Little Canyon Mountain.

Alternative D appears to us to be the preferred choice for providing the most dramatic and predictable improvement in fire risk. The low stand density should promote surface fires of relatively low intensity throughout the planning area. Due to the wide tree spacing, the stands will take longer to "close" and the treatment will persist over a longer time.

Alternative F is probably more ecologically appropriate, in that the prescriptions are site-specific, based on stand composition. On the whole, the target densities should do a reasonable job of reducing the potential fire high-severity fires. We have some concern that the 80-100 BA in the Douglas-fir stands may be too dense to provide long-term relief from fire risk. Adjusting this to at, or near, the density for mixed conifer stands would give us a higher comfort level with this alternative.

One key concern we have is the abundance of snags and down wood, both pre- and post-treatment. As we understand it, the design criteria call for residual snag densities ranging from 5-7.5 per acre and down wood ranging from 144-300 lineal feet per acre. These heavy fuels can create problems with fires spotting and increase fire intensity. We are curious if this retention level is consistent with Section 1.5 of the EA ("Purpose of the Proposed Action"). We would encourage minimizing the heavy dead fuel load as much as possible, particularly immediately adjacent to the urban interface.

Finally, we have some concerns with the possibility of developing the "pit" as an OHV recreation site. Unrestricted OHV use will tend to increase the ignition risk within the urban interface, both from the machines and other associated human activities (smoking, recreational fires, etc.). Also, we have heard concerns expressed from area residents questioning whether concentrated OHV activity is a compatible forest use within a residential area. Lacking any hard information, we are unconvinced that the proposed "buffer" would be adequate to abate noise and dust.

Again, thanks for the opportunity to comment. We would be happy to continue to consult on a less-formal basis as you move toward implementation.

Sincerely,

Russ Lane
Forest Practices/Service F
Oregon Department of Fo
John Day Unit